

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

DOUG SANDEL,  
Plaintiff,

v.

BART BENKE, Individually and  
d/b/a BB TRANSPORT,  
Defendant.

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CASE NO. 6:20-cv-00359-ADA-JCM

**JOINT CONFERENCE REPORT**

COME NOW, Plaintiff **DOUG SANDEL** (“Plaintiff”) and Defendant **BART BENKE, Individually and d/b/a BB TRANSPORT** (“Defendant”) (collectively the “Parties” herein) and submit this Joint Conference Report as required by the Court’s Docket Control Order pursuant to the Rules 16(b) and 26(f). Attorney for Plaintiff David A. Bryant, Jr. and attorney for Defendant Alan Moore conferred and the Parties show the Court as follows:

**I.**

**(A) What changes should be made in the timing, form or requirement for disclosures under Rule 26(a), including a statement of when initial disclosures were made or will be made.**

The Parties agree to exchange their disclosures under Rule 26(a) by July 31, 2020.

**(B) The subjects on which discovery may be needed, when discovery should be completed, and whether discovery should be conducted in phases or be limited to or focused on particular issues.**

The Parties anticipate conducting discovery into the circumstances of the subject accident and the nature, timing and extent of Plaintiff's injuries. The Parties anticipate completing discovery by March 5, 2021. The Parties do not believe that discovery needs to be conducted in phases.

**(C) Any issue about disclosure, discovery, or preservation of electronically stored information, including the form or forms in which it should be produced.**

The Parties do not currently anticipate any issues concerning electronically-stored information.

**(D) Any issues about claims of privilege or of protection as trial-preparation materials, including – if the parties agree on a procedure to assert these claims after production – whether to ask the Court to include their agreement in an order under Federal Rule of Evidence 502.**

The Parties do not currently anticipate a need to ask the Court for an Order under Federal Rule of Evidence 502.

**(E) What changes should be made in the limitations on discovery imposed under these rules or by local rule, and what other limitations should be imposed.**

The Parties do not currently believe any additional limitations on discovery are required other than those imposed under the Federal Rules of Procedure or by local rule.

Dated: July 13, 2020.

Respectfully submitted,

**THE BRYANT LAW FIRM**



By: \_\_\_\_\_

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By: /s/ Alan Moore

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**ATTORNEYS FOR DEFENDANT  
BART BENKE, Individually and d/b/a  
BB TRANSPORT**

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the foregoing instrument has been e-served to all attorneys of record, in compliance with the Texas Rules of Civil Procedure, on this the 13<sup>th</sup> day of July 2020.

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/s/ Alan Moore

**ALAN MOORE**